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in conjunction with Legal Aid of Southern Nevada

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DAVID LEVOYD REED,

Plaintiff

v.

JAMES DZURENDA, et al.,

Defendants

CASE NO. 2:19-cv-00326-CDS-NJK

**STIPULATION AND ORDER
REGARDING PRESENTATION OF
EVIDENCE AT TRIAL**

IT IS HEREBY STIPULATED by and between Plaintiff, DAVID LEVOYD REED by and through his counsel of record, Paola M. Armeni and Tiffany Solari, and Defendants, BRANDON STUBBS, JONATHAN RIVERA, AND AARON DICUS, by and through their counsel of record, Douglas Rand and Taylor M. L. Rivich as follows:

1. The parties will inform the jury Mr. Reed has been convicted of a crime, but the precise crimes will not be identified;
2. Mr. Reed's prior convictions will not be discussed unless the door is opened and such evidence is needed strictly to impeach/contradict Mr. Reed's testimony;
3. Mr. Reed's inmate disciplinary history at the Nevada Department of Corrections relating to events that happened after December 27, 2017 to present is excluded excepting discipline that resulted from this event;

4. Mr. Reed's inmate disciplinary history at the Nevada Department of Corrections from the time prior to December 26, 2017 will not be admitted unless Defendants provide advance notice to Plaintiff of their intent to do so and Plaintiff has the opportunity and time to move to exclude such evidence;
5. The parties stipulate as to the authenticity of medical records and billing allegedly arising from the subject incident, thereby barring the need for testimony from Custodians of Records for authentication purposes;
6. Mr. Reed has incurred the medical expenses as specified in the Medical Expense Summary below;
7. The medical treatment for which the medical expenses were incurred was reasonable and necessary;
8. The charges for the medical expenses in the Medical Expense Summary were within the usual and customary charges for the community;
9. The following Medical Expense Summary may be presented at trial;
10. The need for the treatment in the Medical Expense Summary was caused by the December 26, 2017 incident;

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MEDICAL EXPENSE SUMMARY

PROVIDER	CHARGES
University Medical Center Southern Nevada	\$15,257.55
TOTAL PAST MEDICAL EXPENSES	\$15,257.55

APPROVED AS TO FORM AND CONTENT:

Respectfully submitted this 27th day of January 2023.

CLARK HILL, PLLC

/s/ Paola M. Armeni, Esq.

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ATTORNEY GENERAL'S OFFICE

/s/ Douglas R. Rands, Esq.

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Attorneys for Defendants

ORDER

IT IS SO ORDERED.



 UNITED STATES DISTRICT JUDGE

DATED: January 30, 2023